

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

**LINEAR MOLD & ENGINEERING,
LLC,**

Debtor.

**Case No.: 21-42617-mar
Chapter 11**

Hon. Mark A. Randon

**STIPULATION FOR ENTRY OF AN ORDER ALLOWING PROOF OF
CLAIM OF INDUSTRIAL DEVELOPMENT AND HOLDINGS, LLC
(CLAIM NO. 15)**

Linear Mold & Engineering, LLC (the “Debtor”) and Industrial Development and Holdings, LLC (“Creditor,” and together with Debtor, the “Parties”) hereby stipulate as follows.

WHEREAS, the Creditor filed an unsecured Proof of Claim identified as Claim No. 15 (“the Claim”), addressing certain pre-Petition lease obligations (the “Obligations”) provided by the Creditor to the Debtor; and

WHEREAS, the Debtor scheduled Creditor as an unsecured creditor in its Schedules in a dollar amount lower than that asserted in the Claim; and

WHEREAS, as of the Petition Date, there was a complaint filed in Wayne County Circuit Court between the Debtor and Creditor involving the obligations contained in the Claim, which included claims of Breach of Contract, Unjust Enrichment, Quantum Meruit and Account Stated.

WHEREAS, the Debtor intended to object to the Claim in order to address the aforementioned outstanding issues between the Parties and engaged in settlement negotiations proactively with Creditor to resolve any dispute between the Parties involving the Claim; and

NOW, THEREFORE, in resolution of any dispute regarding the Claim, and in light of the time, expense and uncertainty involved in litigating a potential objection to the Claim, the Parties agree to the entry of the Order attached hereto as **Exhibit A.**

/s/ Lynn M. Brimer
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Industrial Development & Holdings, LLC*

Dated: October 4, 2021

EXHIBIT A

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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[PROPOSED] ORDER ALLOWING PROOF OF CLAIM OF INDUSTRIAL DEVELOPMENT AND HOLDINGS, LLC

This matter having come before the Court upon the stipulation of the Parties;
the Court having reviewed the stipulation and finding good cause to grant the relief
agreed upon therein;

NOW, THEREFORE, IT IS ORDERED:

1. The Proof of Claim of Industrial Development and Holdings, LLC
(Claim No. 15) is hereby ALLOWED as a Class IX general unsecured claim in the
amount of \$200,000.00 under the Debtor's Plan of Reorganization [Docket No. 100],
which was confirmed by Order of this Court on August 2, 2021 [Docket No. 128];
2. The parties shall dismiss the litigation in Wayne County Circuit Court
with prejudice and without costs to either party;
3. This Court shall retain jurisdiction regarding any disputes regarding the
subject matter contained herein.